

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

REBECCA CRAGIN,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 07 C 6705
)	
SUNMIST RESTAURANT, INC.,)	Judge Zagel
GEORGE AVGERIS, individually and as)	
agent of SUNMIST RESTAURANT, INC.,)	Magistrate Judge Brown
)	
Defendant.)	

MOTION FOR ENLARGEMENT OF TIME
TO ANSWER OR OTHERWISE PLEAD

NOW COME the Defendants, SUNMIST RESTAURANT, INC. and GEORGE AVGERIS, individually and as agent of SUNMIST RESTAURANT, INC., by and through their attorneys, NIELSEN, ZEHE & ANTAS, P.C., and for their Motion for Enlargement of Time to Answer or Otherwise Plead, states as follows:

1. Plaintiff filed her Complaint of employment discrimination on November 29, 2007.
2. A waiver of service was executed by the Defendant, *pro se*, and was filed on December 28, 2007.
3. A response to the Complaint is now overdue.
4. Counsel has been recently retained to represent the Defendants. Counsel will need additional time to conduct an investigation necessary to file good faith pleadings in response to the Plaintiff's Complaint.
5. Based upon the above, Defendants' counsel requests an additional thirty (30) days (to and including March 6, 2008) to answer or otherwise plead.

WHEREFORE, the Defendants pray that this Honorable Court enter an Order granting the moving Defendants leave to answer or otherwise plead to Plaintiff's Complaint within thirty (30) days, up to and including March 6, 2008.

s:/Kenneth C. Apicella

Kenneth C. Apicella, ARDC #6269344

Attorneys for Defendant

NIELSEN, ZEHE & ANTAS, P.C.

55 West Monroe Street, Suite 1800

Chicago, Illinois 60603

Telephone: (312) 322-9900

Facsimile: (312) 322-9977

E-mail: kpicella@nzalaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2008, a copy of the foregoing ***DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD*** was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of the filing will be sent to the following parties by operation of the Court's electronic filing system.

Mr. Joel F. Handler
jhandler@cogan-mcnabola.com

s:/Kenneth C. Apicella

Kenneth C. Apicella, ARDC #6269344
Attorneys for Defendant
NIELSEN, ZEHE & ANTAS, P.C.
55 West Monroe Street, Suite 1800
Chicago, Illinois 60603
Telephone: (312) 322-9900
Facsimile: (312) 322-9977
E-mail: kapicella@nzalaw.com